

REMARKS

Claims 2-4, 6-8, 11-20, 27-29 and 34-40 are pending herein.

I. The obviousness rejections based on Onodera et al. (US 6,700,677) or Holmes et al. (US 6,119,108) in view of Auerbach et al. (US 5,673,316) and Shima (US 6,369,909).

The USPTO respectfully rejects Claims 2-4, 6-20, 27-29 and 34-40 under 35 U.S.C. § 103(a) as being obvious over Onodera et al. or Holmes et al. in view of Auerbach et al. and Shima. Of these claims, claims 34 and 38-40 are independent claims.

A. The cited references do not teach or suggest an acquiring section to acquire information regarding a copyright protection level of a printer client which requests the server to send data, as claimed in claim 34.

Regarding the limitations of claim 34 that claim in relevant part:

“an **acquiring section** to acquire information regarding **a copyright protection level of a printer client** which requests the server to send data;”
(emphasis added)

it is respectfully not seen where the cited references teach or suggest the claimed structure quoted above.

Specifically, in the specifically claimed apparatus of claim 34, each printer client has a **copyright protection level**. As explained on page 28 of the present specification, this copyright protection level can be based on protection cover 49 and security system 50, as seen in present Figure 4. As further noted on pages 51-52 of the present specification, **a server 100 can confirm a copyright protection level of a printer client 200** when the printer client requests data. Thus, server 100 has an acquiring section to acquire information regarding a copyright protection level of a printer client, as claimed in claim 34.

In contrast, *it is respectfully not seen where any of the cited references teach or suggest that printer clients have a copyright protection level, and therefore it respectfully follows logically that the cited references do not teach or suggest an acquiring section that acquires information on copyright protection level.*

Specifically, primary reference Onodera discloses a printer 1000 in Figure 2.

However, **Onodera does not teach or suggest that printer 1000 has a copyright protection**

level associated with it. Instead, the only mention of copyrights in Onodera appears to be in relation to the copyright information of an execution program (see, e.g., the abstract of Onodera). It is respectfully noted that this execution program is separate and independent of whatever printer is used, so the copyright information of the execution program is not a copyright protection level of the printer 1000. Thus, because Onodera does not teach or suggest a copyright protection level for printer 1000, it is respectfully asserted that Onodera consequently does not teach or suggest an acquiring section to acquire a copyright protection level from a printer client, as claimed in claim 34.

Similarly, alternative primary reference Holmes does not teach or suggest a printer client having a copyright protection level. While Holmes teaches that information can be printed (for example, see line 10 of the abstract), it is respectfully not seen where Holmes teaches or suggest that such printers have a copyright protection level. Thus, it respectfully follows logically that Holmes does not teach or suggest an acquiring section to acquire a copyright protection level from a printer client, as claimed in claim 34.

Furthermore, the Auerbach and Shima references respectfully do not overcome the deficiencies of the primary references. It is particularly important to note that neither Auerbach nor Shima address copyrights at all, and thus, it is clear that neither Auerbach nor Shima teaches or suggests a printer client having a copyright protection level, as claimed in claim 34. While Shima may teach or suggest security levels, these security levels are respectfully not the same as the specifically claimed copyright protection levels of claim 34. Additionally, because neither Auerbach nor Shima teaches or suggests copyright protection levels for printer clients, it respectfully follows logically that these reference do not teach or suggest an acquiring section to acquire a copyright protection level from a printer client, as claimed in claim 34.

The claimed structure quoted above is important and non-trivial because it provides significant inherent advantages over conventional devices. For example, as explained on pages 37-38, different types of printer clients can have different levels of copyright protection. Thus, the specifically claimed acquiring section of claim 34 can acquire information on the copyright protection level of a given printer client, and the server can send information accordingly.

Thus, it is respectfully asserted that the cited references, taken either alone or in combination, **do not teach or suggest all the claimed limitations of claim 34.** Therefore, it is respectfully asserted that a *prima facie* case of obviousness (see MPEP 706.02(j)) has not been established, and claim 34 is not obvious over the cited references.

B. The cited references do not teach or suggest a comparison table for recording a copyright protection level of the data and a copyright protection level of the printer client in relation to each other, as claimed in claim 34.

Claim 34 claims in relevant part:

“wherein, the server further comprises a comparison table for recording a copyright protection level of the data and a copyright protection level of the printer client in relation to each other.” (emphasis added)

No new matter is introduced by these amendments. Support for the amendments can be found on pages 23-24 of the present specification. Regarding these limitations, it is respectfully not seen where the cited references teach or suggest the claimed structure quoted above.

Specifically, as noted above, **the cited references do not teach or suggest copyright protection levels of printer clients.** Thus, it respectfully follows logically that the cited references do not teach or suggest a comparison table using such copyright protection levels. In other words, **the cited references do not teach or suggest a comparison table that records copyright protection level of data and copyright protection level of a printer client in relation to each other,** as claimed in claim 34.

In contrast, present Figure 3 illustrates one possible embodiment of the claimed structure quoted above. As explained on pages 23-24 of the present specification, **comparison table storage section 19 stores a comparison table that shows the data transmittable to a printer client in accordance with the copyright protection level of the printer client.** For example, as seen on page 40 of the present specification, Table 1 is one possible example of the specifically claimed comparison table of claim 34. As clearly seen in Table 1, **the comparison table records the copyright protection level of the data and the copyright protection level of the printer client in relation to each other,** as claimed in claim 34.

Thus, it is respectfully asserted that the cited references, taken either alone or in combination, **do not teach or suggest all the claimed limitations of claim 34.** Therefore, it is respectfully asserted that a *prima facie* case of obviousness (see MPEP 706.02(j)) has not been established, and claim 34 is not obvious over the cited references.

C. The cited references do not teach or suggest the specifically claimed specifying section as claimed in claim 34.

Claim 34 claims in relevant part:

“a specifying section to specify data to be sent corresponding to the copyright protection level of the printer client, the data being classified in different copyright protection levels according to a content of the data;

...

wherein the specifying section specifies the data to be sent with reference to the comparison table.” (emphasis added)

No new matter is introduced by these amendments. Support for the amendments can be found on page 43 of the present specification. Regarding these limitations, it is respectfully not seen where the cited references teach or suggest the claimed structure quoted above.

Specifically, as noted above, **the cited references do not teach or suggest a copyright protection level of the printer clients and the specifically claimed comparison table** of claim 34. Thus, it respectfully follows logically that the cited references do not teach or suggest **a specifying section** that specifies data based on a printer client's copyright protection level or specifies data with reference to a comparison table, as claimed in claim 34.

In contrast, page 43 of the present specification describes one possible embodiment of the claimed structure quoted above. As explained on page 43 of the specification, server 100 receives a copyright protection level code from a printer client 200. **Server 100 then refers to a comparison table, and specifies data to be sent that corresponds to the printer client's copyright protection level.** Thus, server 100 includes the specifically claimed specifying section of claim 34.

Thus, it is respectfully asserted that the cited references, taken either alone or in combination, **do not teach or suggest all the claimed limitations of claim 34.** Therefore, it

is respectfully asserted that a *prima facie* case of obviousness has not been established (see MPEP 706.02(j)), and claim 34 is not obvious over the cited references.

D. Additional explanation regarding claim 34.

Applicants also respectfully note the following additional points regarding claim 34.

Regarding the Auerbach reference, Auerbach discloses a technology to utilize cryptographic envelopes. According to Auerbach, the envelope is an aggregation of information parts, where each of the parts to be protected is encrypted with a corresponding parts encryption key. The parts encryption key is delivered at the time of delivering the encrypted information parts to a user.

The apparatus of claim 34 claims a specifying section that specifies the data to be sent corresponding to the copyright protection level of the printer client and the copyright protection level of the data. Furthermore, claim 34 claims a comparison table for recording a copyright protection level of the data and a copyright protection level of the printer client in relation to each other, wherein the specifying section specifies the data to be sent with reference to the comparison table.

In contrast to the apparatus of claim 34, each of the information parts in Auerbach are encrypted with a parts encryption key; **however, the data to be sent is not specified corresponding to the copyright protection level of the printer client and the copyright protection level of the data.** Moreover, Auerbach does not disclose the server comprising a comparison table for recording **a copyright protection level of the data and a copyright protection level of the printer client in relation to each other.**

It is respectfully asserted that none of the cited references teaches or suggests the specifically claimed limitations of claim 34 discussed above.

Additionally, the copyright protection level of the printer client differs depending on the security system provided to the printer client and on the location where the printer client is installed (for example, a library or a convenience store). Therefore, in the apparatus of claim 34, **the server specifies the data having an adequate copyright protection level out of various data corresponding to the copyright protection level of the printer client, and**

sends the specified data to the printer client. This configuration ensures the protection of the transmitted data's copyright.

It is respectfully asserted that none of the cited references teaches or suggests the specifically claimed limitations of claim 34 discussed above. Therefore, it is respectfully asserted that claim 34 is allowable.

E. Independent claims 38-40.

Similar to independent claim 34, claims 38-40 also claim a copyright protection level of a printer client. Furthermore, claims 39-40 also claim a comparison table recording a copyright protection level of the data and a copyright protection level of the printer client in relation to each other and a specifying section to specify data to be sent corresponding to the copyright protection level of the client, as claimed in claim 34.

As noted above, it is respectfully asserted the cited references, taken either alone or in combination, do not teach or suggest any of these specifically claimed limitations. Thus, it is respectfully asserted that a *prima facie* case of obvious has not been established and claims 38-40 are therefore allowable.

F. The dependent claims.

As noted above, it is respectfully asserted that independent claims 34 and 39 are allowable, and therefore it is further respectfully asserted that dependent claims 2-4, 6-8, 11-20, 27-29, and 35-37 are also allowable.

G. Additional explanation regarding dependent claim 2.

Applicants further respectfully note the following information regarding claim 2.

Claim 2 claims in relevant part:

“a protection section for protecting the specified data, ~~against outside access in~~
against access from outside into a data transmission path to ~~conduct image~~
output[[,]] the received data.”

The cited references do not teach or suggest the specifically claimed protection section of claim 2. Furthermore, the protection section claimed in claim 2 is respectfully not equivalent to a server that protects copyrights and includes encryption control.

H. Additional explanation regarding dependent claims 6-8.

Applicants further respectfully note the following information regarding claims 6-8.

The USPTO respectfully rejects claims 6-8 using the same reasoning as for claim 2. However, in claims 6-8, the protection section of the printer client is more specifically described. It is respectfully asserted that the cited references do not teach or suggest a protection section that is equivalent to the specifically claimed protection section of claims 6-8.

II. Conclusion.

Reconsideration and allowance of all of the claims is respectfully requested.

If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 06-1130.

Please contact the undersigned for any reason. Applicants seek to cooperate with the Examiner including via telephone if convenient for the Examiner.

Respectfully submitted,

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37 CFR 1.4(d)(2)

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